



MELTZER LIPPE GOLDSTEIN & BREITSTONE, LLP
190 Willis Avenue, Mineola, NY 11501 • T. 516.747.0300
www.meltzerlippe.com

Christopher P. Hampton, Esq.
Writer's Direct Dial: (516) 747-0300 x 153
Writer's Facsimile: (516) 237-2893
Email: champton@meltzerlippe.com

Memo Endorsed

November 22, 2019

Via ECF

The Honorable Ona T. Wang
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 20D
New York, New York 10007

Re: *Shillingford v. Astra Home Care, Inc. et al.*
Docket No. 1:16-CV-06785(KPF)

Dear Judge Wang:

This firm represents Defendants Astra Home Care, Inc., d/b/a True Care Home Health Care ("True Care"), Michael Werzberger, and Rebecca Rosenzweig (collectively, "Defendants") in the above-referenced matter, and we write jointly with counsel for Named Plaintiff Ella Shillingford and for all Opt-in Plaintiffs excluding Erica Jacob-Spencer ("Plaintiffs' Counsel"). In this regard, we write to respectfully request the time by which a proposed collective-action settlement agreement, excluding Ms. Jacob-Spencer, and motion for approval (collectively the "Settlement Documents") must be submitted be adjourned two business days until **November 26, 2019**. Pursuant to your Honor's Individual Practices, Rule I(e): (1) the current deadline for submission of the Settlement Documents in this matter is November 22, 2019 (ECF Doc. No. 103); (2) this is the sixth request for an adjournment of the Settlement Document submission deadline; (3) with the previous request seeking an adjournment from November 8, 2019 to November 22, 2019 being granted; and (4) Plaintiffs join in and consent to Defendants' request as noted above. Relevantly, the parties note the Agreement has been fully negotiated and executed. Thus the only remaining issue is the finalization of the motion for approval, which is currently under revision and should be completed within the additional two days requested.

Accordingly, the Parties respectfully request the time by which the Settlement Documents must be submitted be adjourned until **November 26, 2019**. The Parties sincerely thank the Court for its time and consideration of the foregoing request.

Respectfully submitted,
/s/
Christopher P. Hampton

CPH/kc

cc: All Counsel of Record (via ECF)

Application Granted.

SO ORDERED.

Ona T. Wang 11/25/2019
U.S. Magistrate Judge